

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

In re: James C. Escher, aka James C. Escher, Sr. Debtor. U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR THE NRZ PASS-THROUGH TRUST VII (NPL) Objecting Party v. JAMES C. ESCHER, Respondent.	Bankruptcy 13-20781-jkf Chapter 13 Related to Doc. No. 185
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**RESPONSE TO MOTION FOR DETERMINATION OF FINAL CURE AND PAYMENT
TO NATIONSTAR MORTGAGE LLC**

U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY
BUT SOLELY AS TRUSTEE FOR THE NRZ PASS-THROUGH TRUST VII (NPL) (“Secured
Creditor”), by and through its undersigned attorney, hereby files its Response to Motion for
Determination of Final Cure and Payment to Nationstar Mortgage LLC (“Motion”), and in
support thereof states as follows:

1. James C. Escher (“Debtor”), filed a voluntary petition pursuant to Chapter 13 of the
Bankruptcy Code on December 16, 2013.
2. Secured Creditor holds an interest in Debtor’s real property located at 1167
MUHLENBERG AVE, SWARTHMORE, PA 19081.
3. Secured Creditor filed a proof of claim (Claim No. 2) on May 29, 2014 and subsequently
amended on March 23, 2017 (“Claim”).

4. On December 1, 2019, Debtor filed a Motion for Determination of Final Cure and Payment to Nationstar Mortgage LLC (Doc. No. 185).
5. According to Secured Creditor's records, the Debtor is due for the March 1, 2019 post-petition payment through December 1, 2019. Please refer to the payment history attached hereto as **Exhibit A**.
6. Secured Creditor reserves the right to supplement its Response to the Motion any time before or at the hearing.

WHEREFORE, Creditor respectfully requests that this Honorable Court overrules Debtor's Motion, and for such other and further relief as the Court may deem just and proper.

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By: /s/ Kevin Buttery
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CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served the above captioned pleadings at the addresses specified below on December 10, 2019.

The types of service made on the parties were:

By First-Class Mail:

ROGER V. ASHODIAN
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POLLY A. LANGDON
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United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

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